

1 Frank A. Toddre, II, Esq.
Nevada Bar No. 11474
2 Jonathan A. Rich, Esq.
Nevada Bar No. 15312
3 COZEN O'CONNOR
4 1180 North Town Center Drive
Suite 260
5 Las Vegas, NV 89144
Telephone: 702-470-2330
6 Facsimile: 702-470-2370
Email: FToddre@cozen.com
7 JARich@cozen.com
8 *Attorney for Defendant*
Sonesta International Hotels Corporation

9
10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 ODALYS ZAMORA-YARINE, an individual

13 Plaintiff,

14 v.

15 SONESTA INTERNATIONAL HOTELS
16 CORPORATION, a foreign corporation d/b/a
SONESTA SIMPLY SUITES LAS VEGAS;
17 DOE NEVADA CITIZEN 1; DOES 2 through
18 20, inclusive, and ROE BUSINESS ENTITIES
1 through 20, inclusive,

19 Defendants.
20

CASE NO. 2:24-CV-02120-APG-EJY

**STIPULATION AND ORDER TO
EXTEND BRIEFING SCHEDULE ON
PLAINTIFF'S MOTION TO COMPEL
AND MOTION TO COMPEL TO DEEM
ADMISSIONS ADMITTED**

21 Plaintiff ODALYS ZAMORA-YARINE, by and through her counsel C. Jared Clark, Esq.,
22 Evan K. Simonsen, Esq., and Palvin S. Jhita, Esq., of Clark Law Group, PLLC and Defendant
23 SONESTA INTERNATIONAL HOTELS CORPORATION, by and through its counsel Frank
24 Toddre, Esq., and Jonathan A. Rich, Esq., of Cozen O'Connor, hereby stipulate and agree as follows:

25 1. On May 27, 2025, Plaintiff filed his separate Motion to Compel and Motion to Compel to
26 Deem Admissions Admitted, following which the Court set a briefing schedule as follows:

27 - Defendant's Oppositions due: June 10, 2025

28 - Plaintiff's Responses due: June 17, 2025

2. The parties agree to a short extension of these deadlines to accommodate the schedules of counsel.

3. The parties respectfully request that the Court approve the following revised briefing schedule:

- Defendant's Oppositions due: June 17, 2025

- Plaintiff's Responses due: June 24, 2025

This is the first requested extension of the briefing schedule and is made in good faith and not for the purpose of delay.

DATED this 10th day of June, 2025.

DATED this 10th day of June, 2025.

COZEN O'CONNOR

CLARK LAW GROUP, PLLC

/s/ Jonathan A. Rich

FRANK A. TODDRE, II, ESQ.

Nevada Bar No. 11474

JONATHAN A. RICH, ESQ

Nevada Bar No. 15312

1180 North Town Center Drive, Suite 260

Las Vegas, NV 89144

Attorneys for Defendant

/s/ Palvin S. Jhita

C. JARED CLARK, ESQ.

Nevada Bar No. 13672

EVAN K. SIMONSEN, ESQ.

Nevada Bar No. 13762

PALVIN S. JHITA, ESQ.

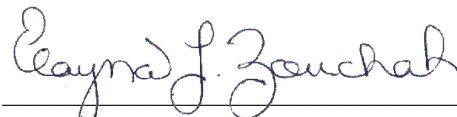
Nevada Bar No. 16716

6655 W. Sahara Ave., Ste. A114

Las Vegas, NV 89146

Attorneys for Plaintiff

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: June 11, 2025